

**BARCLAY DAMON** <sup>LLP</sup>

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*Partner*

July 30, 2025

**VIA CM/ECF**

Hon. Philip M. Halpern  
U.S. District Court Judge  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Stefany Cruz and Marisol Ordonez Vargas v. Orange County (New York);  
Wellpath, LLC, et al.  
Civil No.: 7:25-cv-00064-PMH  
Our File No.: 3225742

Dear Judge Halpern:

My firm represents defendant New York Correct Care Solutions Medical Services, P.C., in connection with the above-referenced matter (the “Defendant”).

The Plaintiffs recently filed their First Amended Complaint (Doc. 26) (“FAC”) adding a new plaintiff and new defendants. The parties respectfully request, for the sake of judicial economy and efficiency, an extension of time for all defendants to respond to the FAC to 30 days after the last defendant has been served with the FAC. This will enable the parties to make appropriate arrangements for the defense/representation of the various defendants. Plaintiff’s counsel and counsel for Orange County consent to and join in this request.

Thank you for Your Honor’s consideration of this request.

Respectfully submitted,



Paul A. Sanders

PAS:np

cc: Elena L. Cohen, Esq. (via CM/ECF)  
Lisa M. Morgillo, Esq. (via CM/ECF)